

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA

In re: KRISTY ROGERS)
ROBERT ROGERS)
)
Debtor(s))
)

CASE NO. 22-81015
CHAPTER 7

MOTION TO RECONSIDER ORDER GRANTING MOTION TO DISMISS CASE

Now Comes the Debtors, KRISTY and ROBERT ROGERS, by and through the undersigned counsel, and moves this Court to reconsider its Order Granting the Trustee's Motion to Dismiss Case and states as follows:

1. The above referenced Debtor filed the underlying bankruptcy case on June 6, 2022.
2. The Debtor submitted all necessary documents to file a complete and competent petition, however I, Franklin Posey acting as their legal counsel, failed to submit a portion of those documents required for a complete Ch. 7 bankruptcy petition.
3. On June 21, 2022, the Trustee filed a Notice of Incorrect Event/Filing for failure to make the initial Ch. 7 payment.
4. The Debtor responded by making the payment within two days.
5. The Debtor has since been given notice of Dismissal by the Bankruptcy Court received on July 1, 2022 for failure to comply with the applicable Bankruptcy Rules in filing the case ie., failure to include pay devices.
6. On July 1, 2022 counsel uploaded all pay devices sufficient to complete the Ch. 7 petition.
7. Counsel prays this court does not dismiss Mr. and Mrs. Roger's Bankruptcy petition for the failings of their counsel and reconsider the Dismissal Order.

WHEREFORE, movant prays for an Order setting aside the Order, along with such further and other relief as this court may deem proper.

Respectfully submitted this the 5th day of July, 2022.

/s/ Franklin D. Posey

Franklin D. Posey
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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing motion on the following as noted below.

This the 5th day of July, 2022.

/s/ Franklin D. Posey
Franklin D. Posey
Attorney at Law

The following were notified via electronic filing...

Trustee
US Bankruptcy Administrator
Clerk of Court

The following were notified via U.S. Mail...

1st Franklin Financial
24833 John T Reid Pkwy 3-B
Scottsboro, AL 35768

GM Financial
P.O.Box 181145
Arlington, TX 76096

Cash Express
2605 S Broad St
Scottsboro, AL 35768

Hollowary Credit Solutions
P.O. Box 230609
Montgomery, AL 36123

Convergent Outsourcing Inc.
800 SW 39th St. 100
Renton, WA 98057

Jefferson Capital System
16 McLeland Rd
Saint Cloud, MN 56303

Credit Central
700 E North St. 15
Greenville, SC 29601

Merchants ADJ Service
P.O. Box 7511
Mobile, AL 36670

First Premier Bank
3820 N Louise Ave
Sioux Falls, SD 57107

Radius Global Solutions LLC
7831 Glenroy Rd 250A
Minneapolis, MN 55439

RC/Resurgent Receivables
P.O. Box 1269
Greenville, SC 29602

TRS Recovery Services
P.O. Box 60022
City of Industry, CA 91716

Security Finance Corporation
P.O. Box 3146
Spartanburg, SC 29304

Webbank/Fingerhut
13300 Pioneer Trail
Eden Prairie, MN 55347

Sun Loan Company
201 Veterans Dr. 105
Scottsboro, AL 35768

Western Funding
3915 E Patrick Lane
Las Vegas, NV 89120